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ITX 1110-90007**MEMORANDUM****To: K. Lawrence, USEPA****From: M. Schwennesen, Technical Assistance Team****Date: February 8, 1995****Subject: Review of Omega Chemical Corporation Drum Storage Stabilization Health and Safety Plan, Omega Chemical Corporation, 12504 East Whittier Boulevard, Whittier, California**

I have performed a cursory review of the above health and safety plan which was prepared by IT Corporation on February 7, 1995. I have the following comments/recommendations regarding the plan:

1. Section 3.1 states that Omega personnel will identify damaged drums. This operation should be conducted by an entity experienced in damaged drum conditions and DOT regulations.
2. Section 3.3 - Flammable Liquids: DOT and RCRA have different definitions for a flammable liquid and flash point. This should be clarified in the text.
3. Table 3-1, chromium PEL: for the purposes of health and safety, hexavalent chromium exposure limits should be addressed, in addition to or rather than trivalent chromium, as hexavalent chromium is much more toxic.
4. Section 4.2.1 states that bulging drums will be opened remotely. This procedure should be described in detail, as it may be required at the site.
5. Section 5.2 states that Level B and Level C personal protection are "not anticipated" at the site. Table 5-1 correctly indicates Level B and Level C personal protection will be employed for drum handling and hazard categorization, respectively.

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6. Section 13, a summary HASP which is site specific, has not been completed. The summary HASP should at a minimum include:
- Specific real-time air monitoring equipment for each expected task;
  - Expected levels of protection for each task;
  - Respiratory protection requirements per task, including SCBA, APR, and APR cartridge type;
  - Site-specific exposure limits based on best available information;
  - Action levels for personal protection upgrade;
  - Specific procedures to be used when encountering drums with unknown contents (including remote drum opening, mentioned above); and
  - Specific procedures for dealing with unstable tiers of drums, drums on crumbling pallets, and forklift safety